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Attorneys for WorldWide Battery Company, LLC

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re: :
: :
DELPHI CORPORATION, *et al.*, : Chapter 11
: Case No. 05-44481 (RDD)
Debtors. : (Jointly Administered)
----- X

AFFIDAVIT OF ELIZA K. BRADLEY

I, Eliza K. Bradley, being first duly sworn upon my oath, state as follows:

1. I am over the age of eighteen (18) years of age, I am competent to testify to and have personal knowledge of, the facts and matters contained in this affidavit, and to the best of my knowledge and recollection, the following representations are true.
2. I am an attorney at Roberge & Roberge and I am one of the attorneys for WorldWide Battery Company, LLC ("WorldWide") in the above referenced case.
3. My business address is 9190 Priority Way W. Dr., Ste. 100, Indianapolis, Indiana 46240. My business telephone number at that location is (317) 818-5500.
4. As part of my representation of WorldWide in this case, I placed a call to (212) 668-2870, the Clerk's Office for the United States Bankruptcy Court for the Southern District of New York (the "Court") on November 16, 2006.

5. I spoke with Melissa, of the Clerk's Office, and advised her that counsel for WorldWide were all Indiana attorneys and not licensed in New York. I told her that we would be filing motions for *pro hac vice* admission and electronic case filing ("ECF") capabilities and I asked her about the timeframe for processing such a request and how soon we would be able to electronically file a document.

6. Melissa advised me that after I mailed my motion for *pro hac vice* admission and application for ECF filing it would be several days before I would receive my password to file documents electronically in the Court.

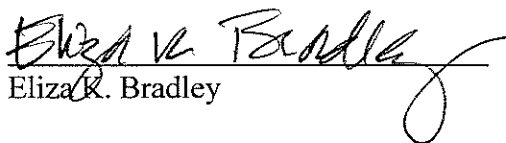
7. I advised Melissa that we had a deadline to file a response with the Court by Friday, November 24, 2006, at 4:00 p.m. She advised me that the Courts would be closed on November 24th; however, the mailroom would be open and would receive mail, via both U.S. mail and Federal Express.

8. Melissa informed me that the mailroom would date stamp the mail as "received" as of November 24th so that it would be received and filed by the deadline even though it would not be processed until the Court re-opened on Monday, November 27th.

Further, the affiant saith not.

VERIFICATION

I affirm, under the penalties for perjury, that the foregoing representations are true.


Eliza K. Bradley

STATE OF INDIANA)
) SS:
COUNTY OF MARION)

Before me, the undersigned Notary Public in and for the State of Indiana, personally appeared **Eliza K. Bradley**, personally known to me or proved to me on the basis of satisfactory evidence to be the individual whose name is subscribed to the foregoing instrument and acknowledged to me that she executed the same in her capacity, and that by her signature on the instrument, the individual, or the person upon behalf of which the individual acted, and executed the instrument as her free act and deed, and stated that the facts contained therein are true.

Dated this 3rd day of January, 2007.

My Commission Expires: 02/07/07

My County of Residence: Boone

Nicole R McKnight
Notary Public

Nicole R McKnight
Printed